

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 23- cr-857 EP
	:	
DAISY SAC	:	18 U.S.C. § 371
	:	18 U.S.C. § 922(a)(1)(A)

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

COUNT ONE
(Conspiracy to Deal Firearms)

INTRODUCTION

1. At all times relevant to this Information:
 - a. Defendant, DAISY SAC (“SAC”) was a resident of New Jersey and was not a licensed dealer, manufacturer, or importer of firearms.
 - b. John Fahy (“Fahy”), a co-conspirator not charged herein, was also a resident of New Jersey and was not a licensed dealer, manufacturer, or importer of firearms.

THE CONSPIRACY

2. From in or around August 2022 through in or around March 2023, in Bergen County, in the District of New Jersey and elsewhere, the defendant,

DAISY SAC,

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code 921, did knowingly and intentionally conspire and agree with others, including Fahy, to commit an offense against the United States, that is, to willfully engage in the business of dealing in firearms without a license, contrary to Title 18, United States Code, Sections 922(a)(1)(A), 923(a) and 924(a)(1)(D).

GOAL OF THE CONSPIRACY

3. The goal of the conspiracy was for SAC and Fahy to profit from illegally transporting firearms from outside the state of New Jersey into New Jersey, and thereafter to sell those firearms without a license.

MANNER AND MEANS OF THE CONSPIRACY

4. It was part of the conspiracy that SAC and Fahy transported firearms from North Carolina into New Jersey and thereafter sold multiple firearms to two individuals (“Individual-1” and “Individual-2”) in New Jersey.

5. Specifically, from in or around August 2022 through in or around March 2023, SAC participated in the sale of six firearms to Individual-1 and in the sale of two firearms to Individual-2.

OVERT ACTS

6. In furtherance of the conspiracy and to effect its unlawful goal, SAC, Fahy, and others committed and caused to be committed the following overt acts in the District of New Jersey and elsewhere:

a. On or about August 12, 2022, SAC and Fahy met with Individual-1 in and around Lyndhurst, New Jersey, and, after negotiating the sale of a firearm with Individual-1, SAC and Fahy provided Individual-1 with a .40 caliber Sig Sauer handgun, bearing serial number SA4-85 384, in exchange for \$1,000.

b. On or about September 7, 2022, SAC and Fahy met with Individual-1 in and around Lyndhurst, New Jersey, and, after negotiating the sale of three firearms with Individual-1, SAC and Fahy provided Individual-1 with three firearms in exchange for \$3,000, namely (i) a Beretta PICO .380 caliber handgun, bearing serial number PC046272, (ii) a Glock 9 mm handgun, bearing serial number BFSX622, and (iii) a Glock 9 mm handgun, bearing serial number 25YUSA1086.

c. On or about September 29, 2022, SAC and Fahy met with Individual-1 in and around Lyndhurst, New Jersey, and, after negotiating the sale of a firearm with Individual-1, SAC and Fahy provided Individual-1 with a Harrington and Richardson Model 733 handgun, bearing serial number AC48156, in exchange for \$520.

d. On or about March 30, 2023, SAC and Fahy met with Individual-1 in and around Lyndhurst, New Jersey, and, after negotiating the sale of a firearm

with Individual-1, SAC and Fahy provided Individual-1 with a Grisan Model Regard MC 9mm handgun, bearing serial number T6368-21A03638 in exchange for \$1,000.

e. On or about March 30, 2023, SAC and Fahy arranged for Fahy to meet with Individual-2 in and around Kearny, New Jersey, and, after negotiating the sale of two firearms with Individual-2, Fahy provided Individual-2 with a Glock Model 43 9mm handgun, bearing serial number ADN403 and a Sig Sauer 9 mm handgun, bearing serial number 66B722861, in exchange for \$2,000.

In violation of Title 18, United States Code, Section 371.

COUNT TWO

(Dealing Firearms without a License)

From in or around August 2022 through in or around March 2023, in Bergen County, in the District of New Jersey and elsewhere, the defendant,

DAISY SAC,

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code 921, did willfully engage in the business of dealing in firearms, and in the course of such business, did transport firearms in interstate commerce, to wit:

- (i) a .40 caliber Sig Sauer handgun, bearing serial number SA4-85 384;
- (ii) a Beretta PICO .380 caliber handgun, bearing serial number PC046272;
- (iii) a Glock 9 mm handgun, bearing serial number BFSX622;
- (iv) a Glock 9 mm handgun, bearing serial number 25YUSA1086;
- (v) a Harrington and Richardson Model 733 handgun, bearing serial number AC48156;
- (vi) a Grisan Model Regard MC 9mm handgun, bearing serial number T6368-21A03638;
- (vii) a Glock Model 43 9mm handgun, bearing serial number ADN403;
- and
- (viii) a Sig Sauer 9 mm handgun, bearing serial number 66B722861.

In violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a) and 924(a)(1)(D).

FORFEITURE ALLEGATIONS

As a result of committing the firearms offenses charged in Counts One and Two of this Information, the defendant,

DAISY SAC,

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in the commission of such offenses, including, but not limited to, the following:


- (i) a .40 caliber Sig Sauer handgun, bearing serial number SA4-85 384;
- (ii) a Beretta PICO .380 caliber handgun, bearing serial number PC046272;
- (iii) a Glock 9 mm handgun, bearing serial number BFSX622;
- (iv) a Glock 9 mm handgun, bearing serial number 25YUSA1086;
- (v) a Harrington and Richardson Model 733 handgun, bearing serial number AC48156;
- (vi) a Grisan Model Regard MC 9mm handgun, bearing serial number T6368-21A03638;
- (vii) a Glock Model 43 9mm handgun, bearing serial number ADN403;
- and
- (viii) a Sig Sauer 9 mm handgun, bearing serial number 66B722861.

SUBSTITUTE ASSETS PROVISION

If any of the property described above, as a result of any act or omission of the defendant:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third party;
- c) has been placed beyond the jurisdiction of the court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.


PHILIP R. SELLINGER
United States Attorney